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October 12, 2022

Via ECF:

Honorable Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street,
New York, New York 10007

Re: Veras v. NYC Department of Education et. al.
22-cv-00056-JLR-SN

Dear Judge Rochon:

Pursuant to the Court's September 27, 2022 Order (Dkt. 35), providing information, to the extent it is relevant, the parties respectfully submit this joint letter:

(1) A brief statement of the nature of the case and/or the principal defenses thereto

Plaintiff asserts federal law claims under Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act ("ADA"), the Rehabilitation Act of 1973 as well as state law claims of negligent infliction of emotional distress ("NIED") and sexual harassment, and discrimination claims under the New York State Human Rights Law and New York City Human Rights Law.

The defenses are to be presented in a motion to dismiss the complaint to be filed on October 13, 2022.

(2) A brief explanation of why jurisdiction and venue lie in this Court

Plaintiff asserts jurisdiction under U.S.C §§ 1331 and 1343.

(3) A statement of all existing deadlines, due dates, and/or cut-off dates

After Defendants moved to dismiss the Complaint on July 5, 2022 (Dkt. No. 19), Plaintiff's filed an Amended Complaint (Dkt. No. 30). Pursuant to this Court's August 17, 2022 Order (Dkt.

No. 27), Defendants' motion to dismiss the Amended Complaint is due to be filed on or before October 13, 2022. No additional dates have been provided for any opposition papers or replies.

Plaintiff intends to either submit a response to the motion to dismiss *or* a Rule 11.b motion for sanctions depending on the contents of defendant's motion to dismiss.

The parties thank the Court for consideration of this request.

Respectfully submitted,

/s/Kissinger N Sibanda

The Law Offices of Kissinger N. Sibanda
Kissinger N. Sibanda, Esq.
Counsel for Plaintiff.

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